

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Chicago Police Officers SHANNON	)	
SPALDING and DANIEL ECHEVERRIA,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 12-cv-8777
	)	
CITY OF CHICAGO, Chicago Police Chief	)	Judge Gary Feinerman
JUAN RIVERA, Chicago Police Chief	)	
JAMES O'GRADY, Chicago Police Chief	)	Magistrate Judge Sheila M. Finnegan
NICHOLAS ROTI, Chicago Police Lt.	)	
Sergeant MAURICE BARNES, Chicago Police	)	
Lt. ROBERT CESARIO, Chicago Police	)	
Commander JOSEPH SALEMME, Chicago	)	
Police Sergeant THOMAS MILLS,	)	
	)	
Defendants.	)	

**PLAINTIFFS' RESPONSE IN OPPOSITION TO DEFENDANTS' THIRD MOTION IN  
LIMINE TO BAR ANY TESTIMONY, EVIDENCE OR ARGUMENT OR REFERENCE  
TO OTHER CIVIL LAWSUITS, COMPLAINT REGISTERS AND/OR DISCIPLINARY  
HISTORIES OF THE INDIVIDUAL DEFENDANTS AND OTHER POLICE  
PERSONNEL WHO MAY TESTIFY**

Plaintiffs agree that they will not attempt to introduce any testimony, evidence or argument or reference to other civil lawsuits, complaint registers and /or disciplinary histories of the individual Defendants, but reserve the right to introduce such evidence with regard to other police personnel who may testify or with regard to Plaintiffs' *Monell* claims. At this point, the Defendants have not identified other police personnel who may testify and therefore Plaintiffs are unable to determine whether they will attempt to introduce testimony of prior complaint registers, civil lawsuits and or disciplinary histories. Therefore Defendants motion should be denied.

Respectfully submitted,

**/s/ Jeffrey L. Taren**

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